

MEMO ENDORSED

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September 14, 2012

The application is ☒ granted.
— denied.

VIA FAX (914-390-4298)

Hon. Edgardo Ramos
United States District Court, SDNY
300 Quarropas Street
White Plains, NY 10601-4150


Edgardo Ramos, U.S.D.J.

Dated: Sept. 18, 2012
White Plains, New York

Re: Coble et al. v. Cohen & Slamowitz, LLP et al.
Index: 11-CV-01037 (ER)

Your Honor:

This office, along with co-counsel, Schlanger & Schlanger, LLP, represents Plaintiffs in the above referenced class action, brought under the Fair Debt Collection Practices Act, 15 U.S.C. 1692, *et seq.* The parties hereby jointly request a further extension of the scheduling Order in this matter.

On May 23, 2012, the parties previously requested a change to the scheduling order on the basis of a discovery dispute then pending before Judge Yanthis in connection with document discovery. That extension was granted. Since that time, Judge Yanthis has resolved the dispute and the parties have made progress both with document discovery and depositions. However, due to a technological problem, tens of thousands of pages of Defendants' documents ordered produced by Judge Yanthis and which are necessary to complete Plaintiffs' depositions of the Defendant were only lately made available to the Plaintiffs. This delayed the parties' plan for the Plaintiffs' depositions of defense witnesses. In addition, due to a health issue affecting the child of one of Plaintiffs' counsel, some scheduled depositions of the Plaintiffs were canceled and have not yet been completed.

I therefore write on behalf of all parties to request that the deadline for conducting non-expert depositions, currently set for September 10, 2012 be extended for 60 days from today's date to allow for Plaintiffs' depositions of the defendant, including both witness depositions and depositions pursuant to Fed. R. Civ. P. 30(b)(6). This will allow the depositions to take place including on issues contained in the document that Judge Yanthis ordered the Defendant to produce.

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There are currently seven depositions yet to be completed, four of witnesses to be produced by the Defendants and three of the named Plaintiffs. The parties are confident that they can complete these eleven depositions prior to the extended deadline.

Respectfully,



Gary Klein

cc: *By Electronic Mail*
T. Leghorn, Esq.;
Shennan Kavanagh, Esq.
Daniel A. Schlanger, Esq.